

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHWESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 21-5003-01-CR-SW-MDH
)	
WILLIAM D. JOHNSON,)	
)	
Defendant.)	

MOTION FOR CONTINUANCE IN SENTENCING

COMES NOW Defendant by his counsel and hereby requests a continuance in the sentencing which is now set on January 26, 2023.

SUPPORTING SUGGESTIONS

1. Counsel needs additional time to effectively represent defendant in the sentencing process.
2. Subsequent to the plea by defendant, the defendant was removed to Oklahoma for his federal case there.
3. Defendant is represented by Oklahoma counsel in that Federal case and his removal was to allow preparation for defense of that case.
4. The removal of the defendant for Oklahoma trial preparation created a void in contact with counsel regarding review of the PSR reports for appropriate objections.
5. The location of the defendant, who is now in St. Clair County has created an inability of proper sentencing preparation.
6. Allowance of this continuance will in no way prejudice the government but will clearly allow effective representation of defendant in presenting his sentencing position.

7. Counsel has additionally been unable to formulate a Sentencing Memorandum with supporting arguments regarding his PSR objections and the requested continuance will allow for such items to support an effective sentence presentation.

WHEREFORE, defendant respectfully requests a continuance in the sentencing.

/s/ Donald R. Cooley
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CERTIFICATE OF SERVICE

I hereby certify that the filing of this Motion on the CM/ECF computer system, which also delivers copies of the same to all counsel of record, was performed on this 23rd day of January, 2023.

/s/ Donald R. Cooley
Donald R. Cooley